

Thomas Freedman Jr. (OSB No. 080697) thomas@prllaw.com
Pearl Law LLC
552 SW 5th Avenue, Suite 1100
Portland, Oregon 97204
Tel: (503) 295-6296 | Fax: (503) 295-6344

Valentin Gurvits (*pro hac vice*) vgurvits@bostonlawgroup.com
Matthew Shayefar (*pro hac vice*) matt@bostonlawgroup.com
Boston Law Group, PC
825 Beacon Street, Suite 20
Newton Centre, Massachusetts 02459
Tel: (617) 928-1800 | Fax: (617) 928-1802

Sean Ploen (*pro hac vice*) sploen@ploen.com
Ploen Law Firm, PC
100 South Fifth Street, Suite 1900
Minneapolis, Minnesota 55402
Tel: (651) 894-6800 | Fax: (651) 894-6801

Evan Fray-Witzer (*pro hac vice*) evan@CFWLegal.com
Ciampa Fray-Witzer, LLP
20 Park Plaza, Suite 505
Boston, Massachusetts 02116
Tel: (617) 426-0000 | Fax: (617) 507-8043

Attorneys for Plaintiff and Counter-defendant Calista Enterprises Ltd.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON – PORTLAND DIVISION

CALISTA ENTERPRISES LTD.,
a Republic of Seychelles company,

Plaintiff,

- v. -

TENZA TRADING LTD.,
a Cyprus company,

Defendant.

Case No. 3:13-cv-01045-SI

EXHIBIT D
TO PLAINTIFF'S FIRST AMENDED
COMPLAINT

TENZA TRADING LTD.,
a Cyprus company,

Counterclaim Plaintiff,

- v. -

CALISTA ENTERPRISES LTD.,
a Republic of Seychelles company, and
ALEXANDER ZHUKOV,
a Czechoslovakian citizen,

Counterclaim Defendants.

Respectfully Submitted,
Plaintiff Calista Enterprises Ltd.
By its Attorneys,

/s/ Matthew Shayefar

Matthew Shayefar (*pro hac vice*)
Valentin Gurvits (*pro hac vice*)
Boston Law Group, PC
825 Beacon Street, Suite 20
Newton Centre, Massachusetts 02459
Tel: (617) 928-1800
Fax: (617) 928-1802
matt@bostonlawgroup.com
vgurvits@bostonlawgroup.com

/s/ Sean Ploen

Sean Ploen (*pro hac vice*)
Ploen Law Firm, PC
100 South Fifth Street, Suite 1900
Minneapolis, MN 55402
Tel: (651) 894-6800
Fax: (651) 894-6801
sploen@ploen.com

Dated: August 7, 2014

/s/ Evan Fray-Witzer

Evan Fray Witzer (*pro hac vice*)
Ciampa Fray-Witzer, LLP
20 Park Plaza, Suite 505
Boston, Massachusetts 02116
Tel: (617) 426-0000
Fax: (617) 507-8043
evan@CFWLegal.com

/s/ Thomas Freedman Jr.

Thomas Freedman Jr. (OSB No. 080697)
Pearl Law LLC
552 SW 5th Avenue, Suite 1100
Portland, Oregon 97204
Tel: (503) 295-6296
Fax: (503) 295-6344
thomas@prllaw.com



Tenza Trading Ltd.
Ioanni Stylianou 6
2nd Floor, Flat 202
Nicosia, Cyprus 2002
Complainant

v.

Calista Enterprises Ltd.
Global Gateway 1749
Rue de la Perle, Providence
Mahe Island, Seychelles
Respondent

Domain Names in Dispute:
largeporntube.com; goldporntube.com;
kissporntube.com; boxporntube.com;
pipeporntube.com; 69porntube.com;
royalporntube.com; bookporntube.com;
cubeporntube.com; freshporntube.com;
lustporntube.com; bonusporntube.com;
directporntube.com

File Number:
FA1303001491515

Respondent's Submission of Other Written Statements and Documents

“The first rule of holes: When you’re in one, stop digging.”
- Molly Ivins

Pursuant to Supplemental Rule 7(c), the Respondent herewith submits other statements and documents in response to the Complainant’s Submission of Other Written Statements and Documents (the “Complainant’s Supplement”). These statements are made to address inaccuracies, attempts to mislead and blatant misrepresentations in the Complainant’s Supplement. Although Complainant did not and could not reply to all of the Respondent’s arguments in the Respondent’s Response, the Respondent gladly replies below to each of the allegations in the Complainant’s Supplement point by point.

However, before addressing each of the Complainant’s Supplement’s allegations point by point, the Respondent must, first, address the Complainant’s most blatant misrepresentation and, second, based on the additional evidence the Respondent now puts forward to expose the Complainant’s blatant misrepresentation, explicitly put forth an additional argument based on laches. However, the Respondent explicitly states its argument for laches should not be mistaken as an admission that the Respondent has engaged in any wrongdoing. As detailed in the Response and supplemented herein, the Respondent has not violated any of the Complainant’s rights and the Complainant cannot satisfy even one of the requirements of Policy ¶ 4(a) in any case.

A. The Complainant and its Website Operator are One and the Same and the Complainant Knew of, Fostered, Encouraged, Rewarded and Profited From the Respondent's Use of the Disputed Domains for Years

The Complainant alleges that it contracts its website operations to “a third party company,” DreamStar Cash SL and that Respondent’s invitation to the webmaster program was from the operator of 4tube, “a completely separate company.” The Complainant puts forth these allegations to attempt to skirt the issue of laches and the fact that it knew of fostered, encouraged, rewarded and profited from the Respondent’s websites and domain names. However, the evidence suggests that Tenza Trading Ltd., DreamStar Cash SL (“DreamStar”), porntube.com and 4tube.com are all operated by the same individuals and as a single business enterprise.

Although the Complainant Tenza Trading Ltd. purports to be the registrant of the porntube.com domain name¹ and owner of the Putative Mark, every aspect of the Complainant’s website is operated by DreamStar (which also operates porntube.com, the Porntube Webmaster Program, 4Tube, Fux and Gals4Free). See DreamStar portfolio page at www.dreamstarcash.com/portfolio, attached hereto as SAnnex 1; DreamStar Facebook page at www.facebook.com/dreamstarcash/info, attached hereto as SAnnex 2.

Steve Matthysen is the founder, owner and chief of DreamStar. See DreamStar Team page at www.dreamstarcash.com/about-us/team, attached hereto as SAnnex 3; See Mr. Matthysen’s “Ask Me Anything” thread on reddit.com, attached hereto as SAnnex 4; See blog post on porntube.com regarding Mr. Matthysen and DreamStar, attached hereto as SAnnex 5. Porntube is unquestionably headed by Mr. Matthysen. See xBiz article on Porntube, attached hereto as SAnnex 6 (“According to the company, the PornTube team, led by online adult industry veteran Steve Matthysen, possesses up to a decade of experience in the affiliate marketing space and has worked with hundreds of affiliate programs over the years. The team’s portfolio includes Gals4Free.net, 4Tube.com and most recently, PornTube.com.”).

Mr. Matthysen and DreamStar are indivisible from the Complainant and the Complainant’s website. Mr. Matthysen is listed as the administrative contact for many of the Complainant’s domain names. See WhoIs results for Oporntube.com, porntubedating.com, porntubepremium.com, porntubepros.com and whatisporntube.com, attached hereto as SAnnex 7.

Mr. Matthysen is also the individual speaking on behalf of the Claimant in the ICQ chat logs referenced in the Respondent’s Response. See information on DreamStar’s gals4free.net website listing ICQ number 59661018 as “Steve,” attached hereto as SAnnex 8; posting by Matthysen on adult industry forum gfy.com with ICQ number 59661018, attached hereto as SAnnex 9.

It is simply dishonest for the Complainant to try to separate Mr. Matthysen and DreamStar from the Complainant and Porntube. Mr. Matthysen is an integral part of the

¹ The Respondent reminds the panel that the Complainant uses a domain privacy service, so this fact has not been confirmed by the Respondent. See Annex 18 to Respondent’s Response.

Complainant's operations, and the Respondent believes that Mr. Matthysen is a director and/or officer of the Complainant. It is plain fact that anything related to Porntube, whether the Putative Mark, the porntube.com domain name, the porntube.com website or the porntube.com webmaster program, is controlled and overseen by Mr. Matthysen.

It seems then that the only relevance in this dispute of the entity that is the Complainant is that it (1) owns the Putative Mark which it, presumably, then licenses to DreamStar to run all its operations and (2) that it files suit against innocent parties like the Respondent. Respondent can only surmise that the Complainant has created this structure so that it can feign ignorance of the actions of Mr. Matthysen and DreamStar.

In light of the above, and as detailed in the Response, the truth is as follows: In September 2009, Mr. Matthysen personally invited the Respondent to join DreamStar's webmaster program. Sometime in early 2011, Mr. Matthysen gained control of Porntube when DreamStar purchased Porntube and began operating it. Over the next two years, the Complainant, through Mr. Matthysen and DreamStar, paid the Respondent over \$130,000 to drive traffic to Porntube. Mr. Matthysen even set up a contest for the Respondent and other webmasters, which the Respondent won. Today, however, the Complainant (whose entire business is run by Mr. Matthysen and DreamStar) is asking the panel to forget everything that happened in the past. It is a request that should not be granted.

B. The Complainant's Claims, If Any Ever Existed, Are Barred by Laches

If, assuming *arguendo*, the Complainant ever had a good faith claim against the Respondent (which the Respondent vigorously denies considering the fact that the Putative Mark is generic and/or descriptive, that the Respondent offers a *bona fide* service and that the Respondent did not act in bad faith when it registered and used the Disputed Domains), the Complainant's claim is now barred by the doctrine of laches. The Complaint and the Respondent entered into a mutually beneficial relationship that lasted for years and all throughout that period and, as detailed above, the Complainant knew, or at the very least should have known, about the Respondent's use of the Disputed Domains. The Complainant has slept on its rights and as a result of this delay (during which time the Complainant benefitted greatly from its affiliation with the Respondent) the Respondent would be unfairly prejudiced if the Complainant's request is granted.

The Respondent emphasizes once again that its argument for laches should not be mistaken as an admission that the Respondent has engaged in any wrongdoing. Its argument is only added in the alternative as a necessary response to the Complainant's demonstrably false allegations that it did not know about the Respondent. As detailed in the Response and supplemented herein, the Respondent has not violated any of the Complainant's rights and the Complainant cannot satisfy even one of the requirements of Policy ¶ 4(a).

C. Point-by-Point Response to the Complainant's Supplemental

The following is a point by point response to the Complainant's Supplement, tracking the Complainant's arguments in order.

- The Complainant states that “Mere allegations in the Petition to Cancel do not negate Complainant’s rights.” However, by the same stroke, a trademark registration is not an impenetrable fortress of rights. Unlike the patent system, trademarks do not undergo a vigorous application process – trademarks are simply registered unless the examiner notices a clear and convincing problem. The presumption of validity is a rebuttable one and the Petition to Cancel is simply the first step the Respondent has taken to rebut that presumption. The Respondent will continue to dispute the validity of the Putative Mark regardless of the outcome of this proceeding. At the very least, however, the *bona fide* disagreement regarding the validity of the Putative Mark casts a grave doubt on any inference the Complainant has asked the panel to take regarding bad faith arising from the Respondent’s use of the Putative Mark.
- A party seeking to cancel the registration of a trademark must overcome the registration’s presumption of validity only by a preponderance of the evidence, the standard burden of proof in civil cases. This standard is set forth clearly in the case referenced by the Complainant, *Cold War Museum, Inc. v. Cold War Air Museum, Inc.*, 586 F.3d 1352, 1356 (Fed. Cir. 2009), therefore the Respondent is at a loss as to why the Complainant would claim that the presumption of validity “is an extremely high hurdle.” It is, in fact, as low as any final hurdle in the legal world.
- The Respondent will dispute the validity of the Complainant’s European and Canadian trademarks just as vigorously and on the same grounds as the U.S. trademark. The invalidity of the U.S. trademark following a petition for cancellation will be strong evidence for the Respondent against the Complainant in Canada and Europe.
- The Complainant is simply (and inexplicably) wrong with regards to its analysis of the Google Search results attached as the Respondent’s Annexes 3 and 4. One does not even have to consult the websites themselves to see that they describe themselves as a porn tube. Twenty five out of thirty use the words “porn tube” in their title or in the short description that shows up in the Google Search results in Annex 3 (even more use it within their web pages). All thirty of the results in Annex 4 use the words “porn tube” in their title or in the short description. Each of these websites use the “porn tube” term in a descriptive or generic nature.
- Although the Complainant argues that the use of the “porn tube” term by all these other websites is infringement of its Putative Mark, as Abraham Lincoln is quoted as saying, “calling a dog’s tail a leg doesn’t make it a leg.” It is not infringement simply because the Complainant says it is so. The Complainant’s argument in this regard assumes its own conclusion.
- The Respondent is unsure as to the relevance of the Complainant’s point that many of websites identified in the search results are commonly owned. The only conclusion that can be drawn from this is that some of the largest streaming adult video networks on the Internet all describe their services as porn tubes (which is an argument in favor of the Respondent).

- The Complainant's suggestion that Annex 5 must be viewed with caution is unsubstantiated as its disagreement with the analysis is, once again, simply wrong. Attached hereto as SAnnex 10 are screen captures of the websites listed by the Complainant showing exactly where the websites use the "porn tube" term descriptively and/or generically.² In each case, the term is used in a fashion visible to users. The fact remains that over 65% of the top porn tube websites on the Internet use the "porn tube" term descriptively (and not just 31%, as the Complainant states).
- The Respondent attached its Annex 2 simply to demonstrate the prevalence of the term "tube" in modern Internet culture and how it grew out of the popularity of YouTube. Consequently, the relevance of the Complainant's SAnnex 3 is lost on the Respondent. It only shows the weakness of the Complainant's Putative Mark.
- The issues relevant to the consent agreement between the registrant of the Putative Mark and the PORNOTUBE mark are exactly as relevant to this dispute. The Complainant admits that it first filed an opposition to the PORNOTUBE mark but eventually entered into a consent agreement with that party, agreeing in the end that there was no confusion between the two marks. Pornotube.com is a porn tube almost exactly like the Complainant's website. It markets to the same exact audiences as the Complainant and the Respondent. There is simply no basis for the Complainant's argument that the factual basis relevant to the PORNOTUBE dispute differs from the current dispute. The Complainant agreed that PORNOTUBE did not infringe upon and is not confused with the Putative Mark. The same conclusion holds with the Disputed Domains.
- Moreover, the Respondent did not put forth its argument regarding the consent agreement for the purpose of showing descriptiveness. The argument was placed in that section of the Response simply because it fit in response to the Complainant's allegation that the Putative Mark was issued without any incident. In this manner, it was clear evidence of bad faith. The Respondent's reliance on the consent agreement was not misplaced. However, as detailed in Section B of the Response, the consent agreement is also evidence that confusion is not possible between the Putative Mark and the Disputed Domains and that the Complainant has essentially stated so in the consent agreement.
- The Respondent's arguments regarding likelihood of confusion are firmly based in law. Courts regularly take into account the use of spaces, colors, fonts and other distinctive depictions in their analysis of likelihood of confusion. See, e.g., *Primepoint, LLC v. Primepay, Inc.*, 545 F. Supp. 2d 426 (D.N.J. 2008) (taking into consideration use of colors, word emphasis and other distinctive renderings for the overall question of "whether the marks viewed separately and in their entirety could lead to the likelihood of confusion"). The fact remains that the rendering of the titles of the Respondent's websites are so distinctive that it is virtually impossible for a user to be confused.

² The Complainant lists tnaflix.com as one of the websites which does not use the "porn tube" term as a generic or descriptive term. The Complainant is right on this account, but the Respondent's Annex 5 never said any differently.

- The Complainant continues to rely solely on the cases of *Target Brands, Inc. v. Bealo Group S.A.* and *AltaVista v. Krotov* for its allegation that the Respondent does not offer a *bona fide* service. As an initial matter, it is shocking that the Complainant continues to argue that the Respondent does not engage in a *bona fide* service given the fact that the Complainant knowingly sought out and paid the Respondent for its service. In any case, its reliance on the case law is misplaced. In the cited cases, the complaints were based on long-standing and unopposed trademarks like TARGET and ALTAVISTA. In neither case did the respondents even argue the question of the validity of the complainant's rights in the disputed mark (in the *AltaVista* case, the respondent did not even make a submission in its defense). The facts could not be any different here. The Respondent vigorously denies the Complainant's rights in the Putative Mark because it is generic and descriptive. Bad faith cannot be attributed to the Respondent simply because the Complainant believes the Putative Mark is indestructible.
- The Complainant's attempted reliance on the Webmaster terms of use is unavailing because it assumes its conclusion that the Respondent is infringing its Putative Mark.
- The Complainant's attempt to discredit the Respondent's Annexes 19 and 21 is bewildering. Annexes 19 and 21 show the Respondent and the Disputed Domains listed on the Complainant's website as one of the Complainant's most successful affiliates. The only party capable of displaying the information shown in Annexes 19 and 21 on the Complainant's website is the Complainant itself and Annexes 19 and 21 are clear evidence that the Complainant knew of the Respondent and the Disputed Domains. The Disputed Domains were not simply one of the supposed 80,000 domains that participated in the Complainant's webmaster program – they were among the most successful domains in the webmaster program, accounted for up to 8.25% of the Complainant's affiliate traffic, were the cause for \$130,000 in compensation to the Respondent by the Complainant and the basis of an extra prize awarded to the Respondent in a highly publicized contest.

The remainder of the Complainant's supplemental response depends upon its disproven allegation that it did not know and could not know about the Respondent's use of the Disputed Domains. This argument is baseless and in bad faith. As proven above in Section A and in the Response, the Complainant knew of, fostered, encouraged, rewarded and profited from the Respondent's use of the Disputed Domains.

In light of the foregoing and prior submissions, the Respondent respectfully requests that the Complainant's remedy should be denied.

Respectfully submitted,
 Respondent Calista Enterprises Ltd.
 By its Attorney,
/s/ Matthew Shayefar
 Matthew Shayefar, Esq.
 Val Gurvits, Esq.
 Boston Law Group, PC

Date: May 2, 2013.

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SANNEX 1

Dreamstar[★]Cash

[PROJECTS](#) [JOBS](#) [ABOUT US](#) [BLOG](#) [FIND US](#)

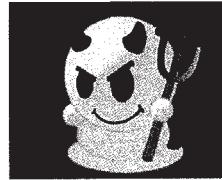
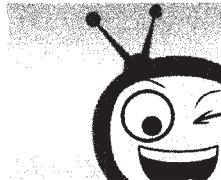
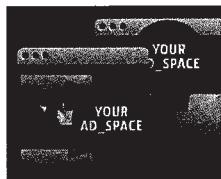
OUR PROJECTS

» [View All Projects](#)

Since its inception back in 2002, DreamstarCash has evolved from a garage venture to a mature start-up. These have been our most notable projects so far:

Show:

- ★ AD
- ★ Adult Online Games
- ★ Affiliate & Partnership Programs
- ★ TGP Sites
- ★ Tube Sites



PornTube
PornTube is a project we just launched and are very excited about!

4Tube
The first site to break the 1 million visitors/day for Dreamstar Cash

Fux
One of our smaller tube sites catering to a broader audience



Gals4Free
Gals4Free focuses on pornstars & is our flagship TGP from back in 2002.

WE LOVE OUR TEAM



LEE

Meet all our Team Members

FROM THE BLOG

Dreamstar Cash, 5th Best Place To Work in Spain for PYMES 2012

December 12, 2012

Today is an important day in the history of Dreamstar Cash, and a very proud moment for our company, our team and myself. We found out that Dreamstar Cash ranks

[Read full post](#)

ACTIVITIES



We develop group activities all year round

[Check out the photos](#)

ON TWITTER

[FOLLOW US ON Twitter](#)

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CERTIFIED BY



Best Workplaces PYMES España 2012

CONTACT US

[Partida Cap Blanç 43 - Local 14
03590 Altea \(Alicante\) Spain](#)

[Send us an email](#)

[+34 965 843 865](#)

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SANNEX 2

facebook



Dreamstar Cash S.L. About ▾

Email or phone	Password
<input type="text"/>	<input type="password"/>
<input type="checkbox"/> Remember me <input type="checkbox"/> Forget your password?	
<input type="button" value="Log In"/>	



Basic Info

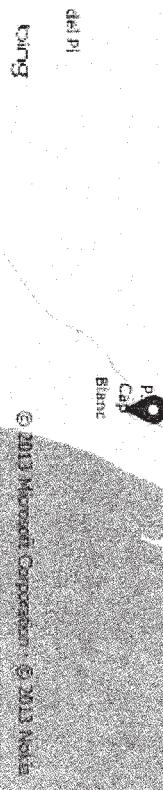
Joined
facebook
12/16/2010

Hours
Mon - Thu: 9:00 am - 6:00 pm
Fri: 9:00 am - 3:00 pm

PornTube.com // 4tube.com

products

Partida Cap Blanch 43 Local 14	Closed until Monday 9:00 am - 6:00 pm
Phone	+34 965 84 38 65
Email	info@dreamstarcash.com
Website	http://www.dreamstarcash.com



About

We operate 4tube.com & PornTube.com among others with a combined 4 million visitors/day

Mobile	Find Friends	Badges	People	Pages	Places	Apps	Games	Music
About	Create Ad	Create Page	Developers	Careers	Privacy	Cookies	Terms	Help
Facebook © 2013 - English (US)								

SANNEX 3

Dreamstar[★]Cash

Like 3 Tweet 0 +1

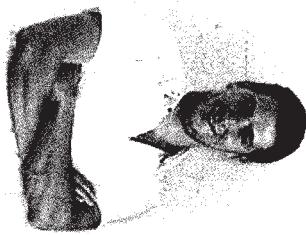
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TEAM

[HOME](#) > [ABOUT US](#) > [TEAM](#)

During 2012 we've almost doubled the size of our highly skilled team, and had some amazing people join us. We have recently been awarded the 5th Best Place To Work in Spain for PYMES 2012. 2013 will see us driving even more ambitious goals in our never ending quest to build a kick ass company both in terms of technology and recruitment!

Steve Matthysen



Founder

“ One of my personal obsessions is to make sure we create one of the best working environments possible which allows everyone to achieve their maximum potential with their individual skill sets. We are always either looking forward or already working on the ‘next big thing’ which has ensured we always have an exciting vibe going on at the office

Steve founded Dreamstar Cash in 2003 and since then has taken it from a one-man-band to an almost 20 strong team that has built sites with millions of visitors a day. His initial primary role as webmaster has slowly transformed and he now finds himself focused on business development strategy and defining the direction of Dreamstar Cash.

He founded the company straight out of University (Mediterranean University Of Science and Technology) where he did his BSC in Business Administration

He admits to being a bit of a petrol-head. In 2010 he competed for the first time in the MINI Challenge Spain where he placed a highly respectable P7 for his rookie season and now has his sights set on racing Porsche GT3!

The Team

SANNEX 4

MY SUBREDDITS - DASHBOARD - FRONT - ALL - RANDOM | add shortcuts from the my_subreddits menu at left or click the button by the subreddit name, drag and drop to sort ↑ ↓ < + >

Ex D - p. 15



related view images (2)

Please check out our recent rule changes!

I run PornTube.com & 4Tube.com (among others) - AMA!! (self.IAMA)

submitted 1 year ago * by porntubecom



Hey redditors!

My name is Steve Matthysen owner of Dreamstar Cash^[1] the company that operates (+18 NSFW – you have been warned!) PornTube.com^[2], 4Tube.com^[3] and a few other sites. In total we manage around 3,5 million visitors/day.

Decided to setup this IAMA after someone posted one of our PornTube launch party pictures on reddit and the thread was forwarded to us <http://www.reddit.com/comments/g5qzy/>^[4]. Also on the thread are DCasa (CTO) and rodcul (Operations & SEO)

EDIT:

Great questions so far guys! We will take a little break here now and check back in 2 hours to answer any new questions. Keep posting and upvoting, we will get back ASAP. Slowly getting quite a few repeat question, so we will only be answering new questions when we check later on! Thanks everyone! This has been fun!

Be sure to follow us on Twitter @porntube^[5] to stay up to date!

EDIT:

Please find our "Aftermath" summary of our 12 hour reddit session on our blog. It's been a real blast, lots of interesting questions, suggestions, and to see so much interest in the first place! Thanks again!

<http://www.porntube.com/blog/2011/06/reddit-ama>^[6]

We are based in Spain so we'll try and keep answering questions till around 22.30 GMT+1 and anything else we'll pickup tomorrow.

2,102 comments share source hide all child comments

[top 200 comments](#) show 500 [subscribe](#)

Sorted by: best ▾

<input checked="" type="checkbox"/> Use subreddit style.
<input type="checkbox"/> Subscribe
<input type="checkbox"/> Moderate
<input type="checkbox"/> Unmoderate
3 201,462 readers
○ 4,276 users here now
login

IAMA

• Proof should be included in the text
• If the post when you submit your

- All AMAs require proof.
- AMAs should be about:
 - Something uncommon that plays a central role in your life, or
 - A truly interesting and unique event.
 - Explanation and examples of this rule can be found here

- Proof should be included in the text
- If the post when you submit your

SANNEX 5

[Home](#) [Videos](#) [Categories](#) [Pornstars](#)

Type search here...

[Blog Home](#) > News > **REDDIT IAMA & PORNTUBE – THE AFTERMATH**

4 **REDDIT IAMA & PORNTUBE – THE AFTERMATH**

by [angelface](#) | June 8th, 2011 | google analytics, IAMA, PornTube, Reddit, Social Media

As you may or may not know Steve Matthysen, owner of Dreamstar Cash, the company that operates PornTube, along with 4Tube and other sites took part in an IAMA on Reddit yesterday – along with Rodney Cullen (Operations and SEO) and Damian Casale (CTO)

I run PornTube.com & 4Tube.com (among others) – AMA!!

Well, we were expecting some interest, but wow – did we underestimate the interest it would cause!! The mammoth Reddit session commenced at approximately 1:30pm GMT+1 yesterday (7th June 2011) and continued until 12:30am GMT+1 today (8th June 2011) – generated over 2,150 comments – and they’re still coming!

Be sure to follow us on Twitter @porntube to see what's new! We'll try and keep answering pickup tomorrow.

2160 comments share unsave hide report

top 200 comments show 500

sorted by: [old](#) ▾

We'd like to take this opportunity to say:

THANKYOU REDDITORS!!!

Thanks to everyone who participated and made this such a worthwhile exercise

[Comment](#)

SEARCH

Search PornTube.com Blog

CATEGORIES

Funny (25)

General (10)

Help Needed: That Means You!! (1)

News (15)

Our Weekly Treat (57)

Pornstar Quotes (1)

Pornstars (8)

PornTube Staff (2)

PORNSTAR

PornTube

PornTube

naughty tuckerz

flashes for all the

clip of the day

opens up her ass for a cock in the kitchen

PornTube's

vid

masturbation? □

Cold Cast &

All Random Friends Piss Acquisition Party Routes Curing Adolescent Woes WMA Tomorrows World Tasks With Extreme Aggressiveness Science Class ERIN

reddit what's not new controversial top saved

Who's Searching YOUR Tube Your Name at Nlife and Find Out

SANNEX 6



[Home](#) > [News](#) > PornTube.com Affiliate Program Resurges With iPad 2 Contest

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NEWS STORY

PornTube.com Affiliate Program Resurges With iPad 2 Contest

XBIZ NEWS REPORT

By Ariana Rodriguez

Friday, Jul 15, 2011 Text size:

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LOS ANGELES — To celebrate the relaunch of the PornTube.com pay-per-click webmaster program, PornTube.com is holding a contest and awarding an Apple iPad 2 to three winners.

Three iPads will be given away in a lottery draw in which webmasters of any capacity are encouraged to participate in. From July 16 to Aug. 15, for every \$100 in traffic a webmaster sends to PornTube's video pages, the contest entrant earns one lottery ticket.

New webmasters that sign up are rewarded with the lottery tickets for the first \$100 that they send, the company said. The contest limits contest entrants to one account per webmaster; and current webmasters are not allowed to sign up new accounts.

PornTube initially launched its basic pay-per-click program for webmasters in December. The company says that after careful analysis of active webmaster feedback and evaluation of other programs, it has revamped and retooled its affiliate program, offering webmasters up to \$2 per 1,000 uniques.

"Among the biggest complaints expressed by webmasters about other programs was ineffective tracking of unique visitors, and deceiving terms based on the fine print webmasters tend to overlook, i.e. some do not pay for traffic from all countries, some track uniques in a very tricky way," the company said.

The PornTube Webmaster Program pays for traffic from all countries, and tracks a 24 hour unique on a per domain basis.

"During our soft launch period, affiliates' feedback noted their particular contentment with the export tools," the company said. "Additionally, we have also noticed some of the 'whale affiliates' suddenly ramping up their traffic volume to us because of our increased payout rates and our tracking method."

According to the company, the PornTube team, led by online adult industry veteran Steve Matthysen, possesses up to a decade of experience in the affiliate marketing space and has worked with hundreds of affiliate programs over the years. The team's portfolio includes Gals4Free.net, 4Tube.com and most recently, PornTube.com.

"We have navigated our way through all of the inflexible export tools, bad conversions, and other affiliate headaches to come up with a webmaster program that is the most powerful money making machine for webmasters worldwide," Matthysen said. "To date, the feedback from active affiliates has been extremely positive, however, we are always looking to make it easier and enticing for webmasters to send more traffic and earn top dollar."

To contact PornTube, email support@porntube.com.

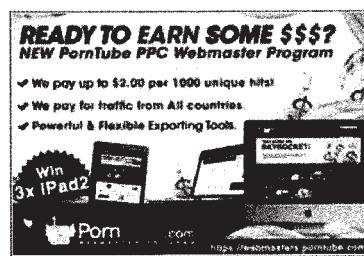
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WHOIS search results for:
PORNTUBEPREMIUM.COM
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Registered through: GoDaddy.com, LLC (<http://www.godaddy.com>)
Domain Name: PORNTUBEPREMIUM.COM
Created on: 01-Mar-08
Expires on: 01-Mar-14
Last Updated on: 14-Jan-13

Registrant:
Tenza Trading Ltd

Ioanni Stylianou 6
2nd Floor, FlatOffice 202
Nicosia, Nicosia 2003
Cyprus

Administrative Contact:
Matthyssen, Steve domains@tenzatrading.com
Tenza Trading Ltd
Ioanni Stylianou 6
2nd Floor, FlatOffice 202
Nicosia, Nicosia 2003
Cyprus
+357.34661260500

Technical Contact:
Matthyssen, Steve domains@tenzatrading.com
Tenza Trading Ltd
Ioanni Stylianou 6
2nd Floor, FlatOffice 202
Nicosia, Nicosia 2003
Cyprus
+357.34661260500

Domain servers in listed order:
NS01.CASHPARKING.COM
NS02.CASHPARKING.COM

Registry Status: clientDeleteProhibited
Registry Status: clientRenewProhibited
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Domains available for new registration:

Alternate TLDs

<input type="checkbox"/> porntubepremium.co	SAVE!	\$12.99/yr
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Similar Premium Domains

<input type="checkbox"/> PremiumPipeTobacco.com	\$688.00*
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<input type="checkbox"/> Ends on: 6/30/2013 10:03:00 AM PDT	\$1,888.00*
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 Domain Name: PORNTUBEDATING.COM
 Created on: 08-Feb-12
 Expires on: 08-Feb-14
 Last Updated on: 28-Nov-12

Registrant:
 Tenza Trading Ltd

Ioanni Stylianou 6
 2nd Floor, Flat/Office 202
 Nicosia, Nicosia 2003
 Cyprus

Administrative Contact:
 Matthysen, Steve domains@tenzatrading.com
 Tenza Trading Ltd
 Ioanni Stylianou 6
 2nd Floor, Flat/Office 202
 Nicosia, Nicosia 2003
 Cyprus
 3-466-126-0500

Technical Contact:
 Matthysen, Steve domains@tenzatrading.com
 Tenza Trading Ltd
 Ioanni Stylianou 6
 2nd Floor, Flat/Office 202
 Nicosia, Nicosia 2003
 Cyprus
 3-466-126-0500

Domain servers in listed order:
 NS55.DOMAINCONTROL.COM
 NS56.DOMAINCONTROL.COM

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<input type="checkbox"/> porntubedating.info	SAVE!	\$2.99*/yr
<input type="checkbox"/> porntubedating.net	SAVE!	\$9.99*/yr
<input type="checkbox"/> porntubedating.org	SAVE!	\$6.99*/yr
<input type="checkbox"/> porntubedating.ca	SAVE!	\$12.99/yr
<input type="checkbox"/> porntubedating.us	SAVE!	\$3.99/yr
<input type="checkbox"/> porntubedating.me	SAVE!	\$9.99/yr
<input type="checkbox"/> porntubedating.ws	SAVE!	\$15.99/yr

Similar Premium Domains

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<input type="checkbox"/> CultureDating.com	\$749.00*
<input type="checkbox"/> WivesDating.com	\$1,349.00*
<input type="checkbox"/> Poj.com	\$788.00*
<input type="checkbox"/> PopJ.com	\$4,388.00*
<input type="checkbox"/> PoQ.com	\$4,267.00*

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<input type="checkbox"/> 1stdating.com	Ends on: 6/26/2013 1:05:00 PM PDT	\$3,288.00*
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<input type="checkbox"/> tubeGear.com	Ends on: 6/26/2013 9:31:00 AM PDT	\$3,688.00*
<input type="checkbox"/> tubeCenter.com	Ends on: 6/26/2013 9:09:00 AM PDT	\$4,088.00*
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Registered through: GoDaddy.com, LLC (<http://www.godaddy.com>)
Domain Name: PORNTUBEPROS.COM
Created on: 08-Mar-09
Expires on: 08-Mar-14
Last Updated on: 14-Jan-13

Registrant:
Tenza Trading Ltd

Ioanni Stylianou 6
2nd Floor, FlatOffice 202
Nicosia, Nicosia 2003
Cyprus

Administrative Contact:
Matthyssen, Steve domains@tenzatrading.com
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Cyprus
+357.34661260500

Technical Contact:
Matthyssen, Steve domains@tenzatrading.com
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Nicosia, Nicosia 2003
Cyprus
+357.34661260500

Domain servers in listed order:
NS01.CASHPARKING.COM
NS02.CASHPARKING.COM

Registry Status: clientDeleteProhibited
Registry Status: clientRenewProhibited
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Domains available for new registration:

Alternate TLDs

<input type="checkbox"/> porntubePros.co	SAVE!	\$12.99/yr
<input type="checkbox"/> porntubePros.info	SAVE!	\$2.99*/yr
<input type="checkbox"/> porntubePros.net	SAVE!	\$9.99*/yr
<input type="checkbox"/> porntubePros.org	SAVE!	\$6.99*/yr
<input type="checkbox"/> porntubePros.ca		\$12.99/yr
<input type="checkbox"/> porntubePros.us	SAVE!	\$3.99/yr
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Similar Premium Domains

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<input type="checkbox"/> GunControlPros.com	\$475.00*
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Enter a domain name to search .COM

Go Daddy Global

Language: English Country: United States Currency: United States Dollar \$ (Transactional)

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My Renewals	Web Hosting	WHOIS search	Product Support	News Releases	iPhone Application	Go Daddy (Español)
Order History	Product Catalog	ICANN Confirmation	Discussion Forums	Careers	iPad Application	Go Daddy Australia
Create Account	Go Daddy Gear	Affiliates	User Groups	Go Daddy Cares	Android Application	Go Daddy Canada
	Deals of the Day	Follow & Fan Us	Submit Support Ticket	Marketing Opportunities	Visit Go Daddy Mobile	Go Daddy India
		Legal	Site Suggestions	Customer Testimonials		Go Daddy United Kingdom
		Small Business Center	Report Abuse	Security Center		
			Site Map	.ME Scholarship		
Follow & Fan Us				Round Up for Charity	Sign Up for Special Offers	
				Bob's Video Blog	Email Address	<input type="button" value="Submit"/>
				Inside Go Daddy		

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Hablamos Español[Commercials](#) | [Deals](#) | [Bob's Blog](#)[All Products](#) ▾[Cart](#) ▾[Find Your Domain](#)[Build your Website](#)[Get website Hosting](#)[Grow with Web Tools](#)[WHOIS Domain Check](#)

WHOIS search results for:

WHATISPORNTUBE.COM

(Registered)

Is this your domain?

Add hosting, email and more.

Want to buy this domain?

Get it with our Domain Buy service.

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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, LLC is not the registrant of domain names listed in this database.

Registered through: GoDaddy.com, LLC (<http://www.godaddy.com>)
 Domain Name: WHATISPORNTUBE.COM
 Created on: 07-Jan-08
 Expires on: 07-Jan-14
 Last Updated on: 28-Nov-12

Registrant:
 Tenza Trading Ltd

Ioanni Stylianou 6
 2nd Floor, FlatOffice 202
 Nicosia, Nicosia 2003
 Cyprus

Administrative Contact:
 Matthysen, Steve domains@tenzatrading.com
 Tenza Trading Ltd
 Ioanni Stylianou 6
 2nd Floor, FlatOffice 202
 Nicosia, Nicosia 2003
 Cyprus
 +357.34661260500

Technical Contact:
 Matthysen, Steve domains@tenzatrading.com
 Tenza Trading Ltd
 Ioanni Stylianou 6
 2nd Floor, FlatOffice 202
 Nicosia, Nicosia 2003
 Cyprus
 +357.34661260500

Domain servers in listed order:
 NS01.CASHPARKING.COM
 NS02.CASHPARKING.COM

Registry Status: clientDeleteProhibited
 Registry Status: clientRenewProhibited
 Registry Status: clientTransferProhibited
 Registry Status: clientUpdateProhibited

[See Underlying Registry Data](#)
[Report Invalid Whois](#)

Domain already taken?

Enter domain name

[.com](#)[Search](#)

NameMatch Recommendations

GoDaddy.com NameMatch has found similar domain names related to your search. Registering multiple domain names may help protect your online brand and enable you to capture more Web traffic, which you can then direct to your primary domain.

Domains available for new registration:

Alternate TLDs

<input type="checkbox"/> whatisporntube.co	SAVE!	\$12.99/yr
<input type="checkbox"/> whatisporntube.info	SAVE!	\$2.99*/yr
<input type="checkbox"/> whatisporntube.net	SAVE!	\$9.99*/yr
<input type="checkbox"/> whatisporntube.org	SAVE!	\$6.99*/yr
<input type="checkbox"/> whatisporntube.ca		\$12.99/yr
<input type="checkbox"/> whatisporntube.us	SAVE!	\$3.99/yr
<input type="checkbox"/> whatisporntube.me	SAVE!	\$9.99/yr
<input type="checkbox"/> whatisporntube.ws		\$15.99/yr

Similar Premium Domains

<input type="checkbox"/> WhatMenNeed.com	\$799.00*
<input type="checkbox"/> WhatWasHeThinking.com	\$1,149.00*
<input type="checkbox"/> DoWhatWant.com	\$1,249.00*
<input type="checkbox"/> TubeInc.com	\$515.00*
<input type="checkbox"/> TubeFan.com	\$3,588.00*

Domains available at Go Daddy Auctions®:

<input type="checkbox"/> whathappensinlasvegasstaysinlasvegas.com	\$10,000.00*
<input type="checkbox"/> whatpeoplearetalkingabout.com	\$100.00*
<input type="checkbox"/> whatpeoplearetalkingaboutonline.com	\$100.00*
<input type="checkbox"/> whatclub.com	\$599.00*
<input type="checkbox"/> whatonealcatalog.com	\$2,000.00*
<input type="checkbox"/> whataremrecordsorth.com	\$20,000.00*

Learn more about

[Private Registration](#)[Deluxe Registration](#)[Business Registration](#)[Protected Registration](#)

*Plus ICANN fee of \$0.18 per domain name/year.
**.CA domain names will be registered through Go Daddy Domains Canada, Inc., a CIRA certified registrar.

Enter a domain name to search .com

Go Daddy Global

Language: English | Country: United States | Currency: United States Dollar \$ (Transactional)

Account Manager	Shopping	Resources	Support	About Go Daddy	Mobile	Global Sites
My Account	Domain Search	Webmail	Telephone Support & Sales	About Us	Go Daddy, on the GO!	Go Daddy (English)
My Renewals	Web Hosting	WHOIS search	Product Support	News Releases	iPhone Application	Go Daddy (Español)
Order History	Product Catalog	ICANN Confirmation	Discussion Forums	Careers	iPad Application	Go Daddy Australia
Create Account	Go Daddy Gear	Affiliates	User Groups	Go Daddy Cares	Android Application	Go Daddy Canada
		Deals of the Day	Follow & Fan Us	Submit Support Ticket	Marketing Opportunities	Visit Go Daddy Mobile
			Legal	Site Suggestions	Customer Testimonials	Go Daddy India
			Small Business Center	Report Abuse	Security Center	Go Daddy United Kingdom
			Site Map		.ME Scholarship	
Follow & Fan Us				Round Up for Charity	Sign Up for Special Offers	
				Bob's Video Blog	Email Address	Submit

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Hablamos Español

WHOIS search results for:
OPORNTUBE.COM
(Registered)

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Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, LLC is not the registrant of domain names listed in this database.

Registered through: GoDaddy.com, LLC (<http://www.godaddy.com>)
Domain Name: OPORNTUBE.COM
Created on: 24-Jul-07
Expires on: 24-Jul-14
Last Updated on: 12-Apr-13

Registrant:
Tenza Trading Ltd

Ioanni Stylianou 6
2nd Floor, FlatOffice 202
Nicosia, Nicosia 2003
Cyprus

Administrative Contact:
Matthyssen, Steve domains@tenzatrading.com
Tenza Trading Ltd
Ioanni Stylianou 6
2nd Floor, FlatOffice 202
Nicosia, Nicosia 2003
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+357.34661260500

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[See Underlying Registry Data](#)
[Report Invalid Whois](#)

Is this your domain?
Add hosting, email and more.

Want to buy this domain?
Get it with our Domain Buy service.

Domain already taken?

Enter domain name

.com

▼ **Search**

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<input type="checkbox"/> oporntube.co	SAVE!	\$12.99/yr
<input type="checkbox"/> oporntube.info	SAVE!	\$2.99*/yr
<input type="checkbox"/> oporntube.net	SAVE!	\$9.99*/yr
<input type="checkbox"/> oporntube.org	SAVE!	\$6.99*/yr
<input type="checkbox"/> oporntube.ca		\$12.99/yr
<input type="checkbox"/> oporntube.us	SAVE!	\$3.99/yr
<input type="checkbox"/> oporntube.me	SAVE!	\$9.99/yr
<input type="checkbox"/> oporntube.ws		\$15.99/yr

Similar Premium Domains

<input type="checkbox"/> TubeInc.com	\$515.00*
<input type="checkbox"/> TubeFan.com	\$3,588.00*

Domains available at Go Daddy Auctions®:

<input type="checkbox"/> tubetechnology.com	Ends on: 6/26/2013 12:50:00 PM PDT	\$1,682.00*
<input type="checkbox"/> tubegear.com	Ends on: 6/26/2013 9:31:00 AM PDT	\$3,688.00*
<input type="checkbox"/> tubecenter.com	Ends on: 6/26/2013 9:09:00 AM PDT	\$4,088.00*
<input type="checkbox"/> mp4porn.com	Ends on: 6/5/2013 11:00:00 PM PDT	\$950.00*
<input type="checkbox"/> tubeaxialfans.com	Ends on: 5/31/2013 9:45:00 AM PDT	\$999.00*
<input type="checkbox"/> quartztube.com	Ends on: 5/30/2013 12:45:00 PM PDT	\$1,799.00*

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[Business Registration](#)

[Deluxe Registration](#)

[Protected Registration](#)

*Plus ICANN fee of \$0.18 per domain name/year.

**.CA domain names will be registered through Go Daddy Domains Canada, Inc., a CIRA certified registrar.

Enter a domain name to search .com

Go Daddy Global

Language: English Country: United States Currency: United States Dollar \$ (Transactional)

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My Account	Domain Search	Webmail	Telephone Support & Sales	About Us	Go Daddy, on the GO!	Go Daddy (English)
My Renewals	Web Hosting	WHOIS search	Product Support	News Releases	iPhone Application	Go Daddy (Español)
Order History	Product Catalog	ICANN Confirmation	Discussion Forums	Careers	iPad Application	Go Daddy Australia
Create Account	Go Daddy Gear	Affiliates	User Groups	Go Daddy Cares	Android Application	Go Daddy Canada
	Deals of the Day	Follow & Fan Us	Submit Support Ticket	Marketing Opportunities	Visit Go Daddy Mobile	Go Daddy India
		Legal	Site Suggestions	Customer Testimonials		Go Daddy United Kingdom
		Small Business Center	Report Abuse	Security Center		
		Site Map		.ME Scholarship		
Follow & Fan Us				Round Up for Charity	Sign Up for Special Offers	
				Bob's Video Blog	Email Address	
				Inside Go Daddy		Submit

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[Legal](#) | [Privacy Policy](#).

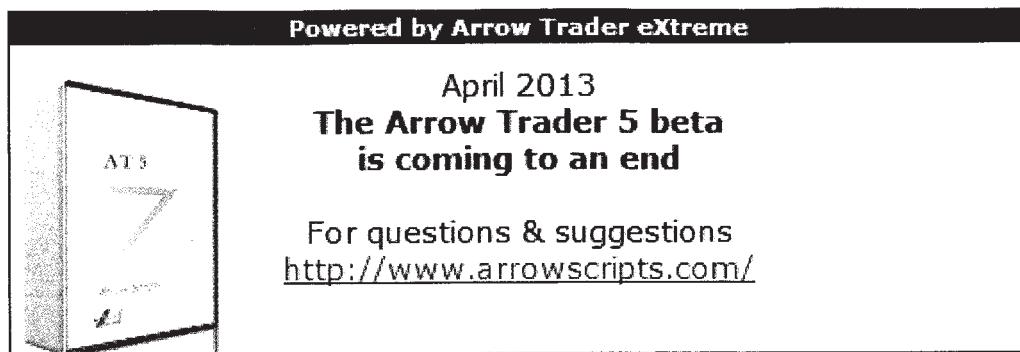
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SANNEX 8

**Rules**

- Minimum of 200 hits / day
- Minimum of 60% content
- No Pop-ups / exit consoles
- No Dialers or redirects for any country

My Info

Domain	www.gals4free.net
URL	http://www.gals4free.net
ICQ	59661018
Email	coolness@wanadoo.es
Name	Steve
Title	Gals 4 Free

Webmaster Stats

Domain	<input type="text"/>
Password	<input type="password"/>
	<input type="button" value="login"/>

Retrieve password

Domain	<input type="text"/>
	<input type="button" value="retrieve"/>

Partner Accounts

account username	<input type="text"/>
account password	<input type="password"/>
domain	<input type="text"/>
url	<input type="text"/>
title	<input type="text"/>
email	<input type="text"/>
icq	<input type="text"/>
nickname	<input type="text"/>
password	<input type="password"/>
short description:	<input type="text"/>
	<input type="button" value="Add Trade"/>

SANNEX 9

User Name	<input type="text" value="User Name"/>	<input checked="" type="checkbox"/> Remember Me?
Password	<input type="password"/>	<input type="button" value="Log in"/>
#1		

09-02-2004, 02:13 PM

Gals4free! Registered User

Join Date: Apr 2003
Posts: 472

Dreamstar Cash launches Dirty Daisy!

Hey everyone!

Today we are proud to add a site to our portfolio! Dirty Daisy!
<http://www.dirtydaisy.com>. The last month we have been working closely together with them and put together an awesome site! An all exclusive amateur/babe girl which from the looks of it is going to go a long way! It includes a chat forum for members to talk with her, live webcam shows every week, lots of updates with high quality pictures and videos! The forum is already pretty active considering the site is "online" since two days. Just some personal fans of her. This is a winner for sure

For those who haven't signed up with Dreamstar Cash yet, do so now at <http://DREAMSTAR.CASH>. There are already a couple of hosted galleries added, we will be adding more soon. Also some sets are added to the free content area, but if you are serious about promoting hit me up on ICQ and i can hook you up with more content. These guys are fucking like rabbits at the rate im getting the new content

[Hosted Galleries](#) | [Hosted Gallery #1](#)

More things are happening here at Dreamstar Cash. We got another site coming soon focused 100% on pornstar dvds. We are encoding the videos in very high quality, i have yet to find a site that has better quality, so we might be putting a new standard!

We should see the launch of that site by mid september hopefully. When that site launches we are going to have a contest where everyone can be part of! More about that soon! If you got any suggestions for prizes (even though we have some already) drop us a mail at support@dreamstar.cash.

Now go get some links up and watch this site convert!

Steve
ICQ: 59661018

At Dreamstar Cash we have in excess of 4m visitors a day through our network that consists of New York City based adult movie sites and New York City based adult movie studios. We operate the very successful Content Publishing Platform at <http://content.dreamstar.cash> where we have the unique offer of no affiliate code embedded into your promo banners for clip submissions of 10 minutes or longer. That means you get all traffic from us AFFILIATE free!

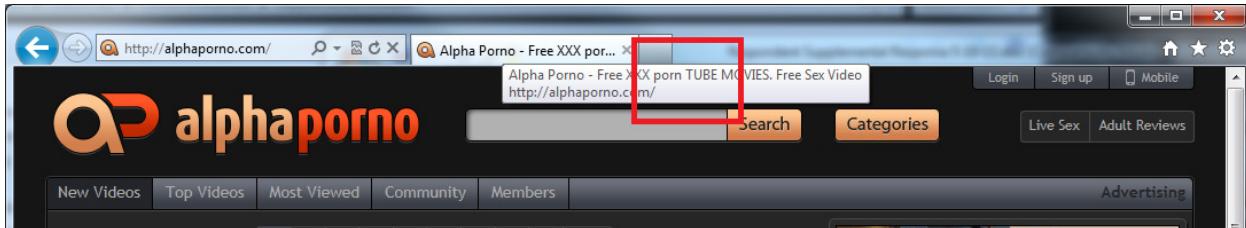


Download the PornTube.com Content Publishing Program Guide and Turn your Content into Traffic!



SANNEX 10

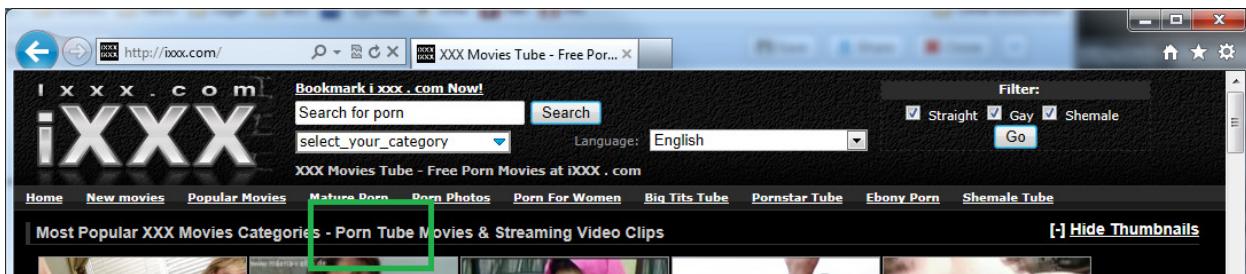
Alphaporno.com



Hellporno.com



ixxx.com



Spankwire.com



Sunporno.com

The screenshot shows the SunPorno.com homepage. At the top, there's a navigation bar with links for 'HOME', 'CATEGORIES', 'PHOTOS', 'PORNSTARS', 'COMMUNITY', 'LIVE CAMS', 'ADULT DATING', 'SEX SHOP', and 'FAQ'. Below the navigation is a search bar with dropdown menus for 'Movies' and 'Search'. On the right side of the header, there are 'Login' and 'Sign Up' buttons. The main content area features a large banner for 'SUN PORN' with the word 'Tube' in red. Below the banner, there's a section titled 'ENTERTAIN YOURSELF' with a sub-section for 'I like: STRAIGHT', 'GAY', and 'SHEMALE'. A green rectangular box highlights the search bar area.

This screenshot shows a detailed view of the SunPorno.com disclaimer. It states that all models are 18 years or older and that Sun Porno has a zero-tolerance policy against illegal pornography. Below this, there's a logo for 'ASACP APPROVED MEMBER' and a link to 'Protect your children from adult content'. A green rectangular box highlights the disclaimer text. At the bottom of the page, there are links for 'General info', 'Community', and 'Webmasters', and a dark sidebar labeled 'Advertising'.

Video-one.com

67. Videos Bang	137. Porn Clips Now	207. Filth Matures	277. Antagram	347.
68. Good Fuck	138. Porno Jo	208. Hard Stream Sex	278. HQ Tube Porno	348.
69. The Movs	139. Tube Porn Now	209. Fat Cow Tube	279. Mochito	349.
70. Sex Tube Store	140. Crunk Movies	210. Hot Porn Tube	280. Wui Wui	350.

My Favorite Sites

01. Video One	05. Mag Post	09. Woch	13. sex free porn . com	17.
02. DT Video	06. Video Diva	10. King Love	14. Sex Movies	18.
03. SFICO	07. Wood Room	11. Cloy Porn	15. Porn Videos	19.
04. Pink Dino	08. Boo Loo	12. Porn Rule	16.	20.

Disclaimer: Video One is a fully automatic adult search and index engine focused on free porn tube clips. We do not own, produce or host the videos embedded on this website. All of the videos embedded on our site are hosted by websites that are not under our control. The linked videos are automatically gathered and added into our system by our spider scripts. Thumbnails are automatically generated from the videos. "Categories" is just a list of the most popular search queries entered by surfers. The list of related phrases is also based on surfers search queries.

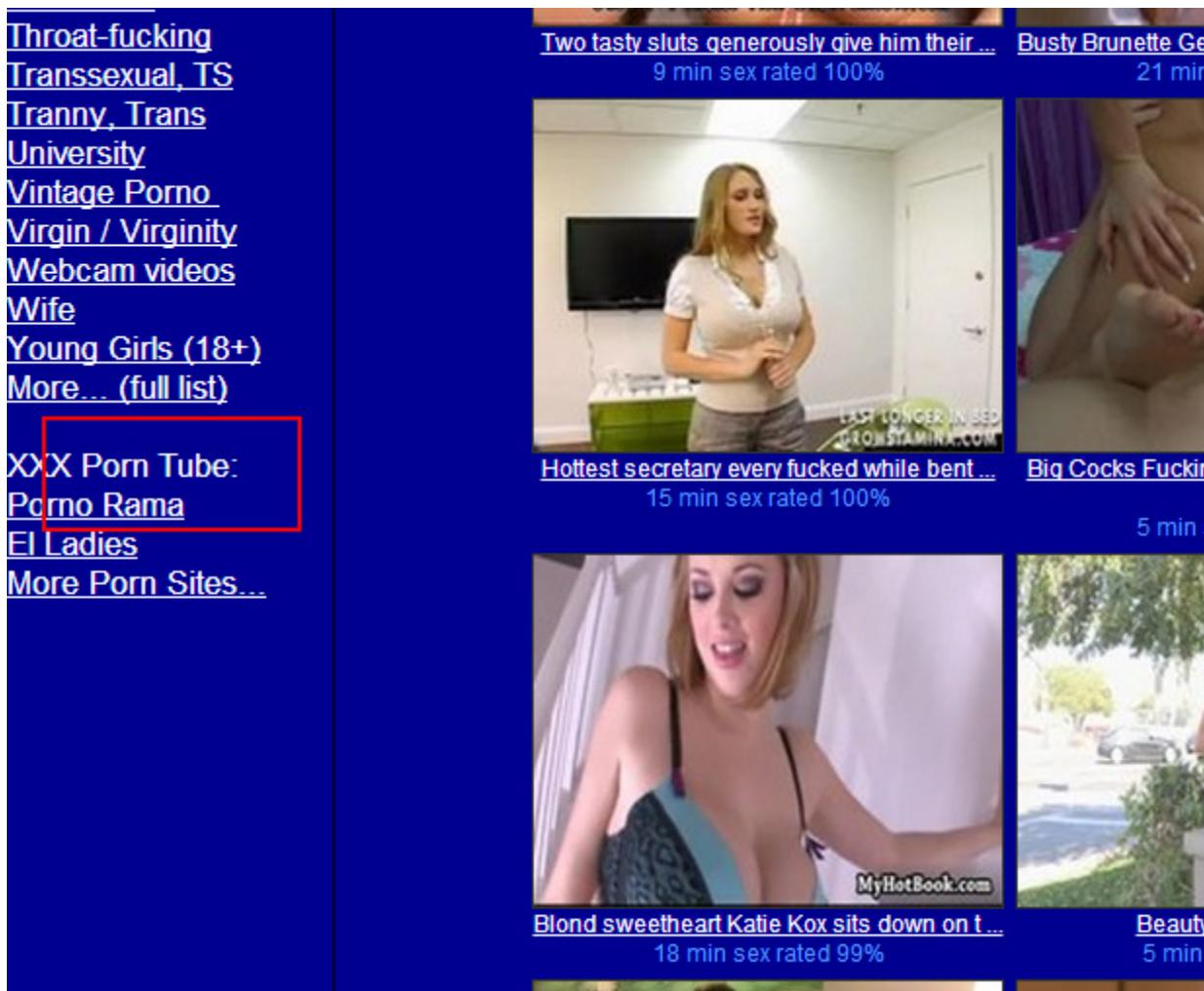
Video One has a zero-tolerance policy against illegal pornography. We take no responsibility for the content on any website which we link to. We take no responsibility for the phrases entered by surfers. Please contact us if you have found inappropriate content.

Parents - Protect your children from adult content with these services: Cyber Patrol | Net Nanny | Cyber Sitter

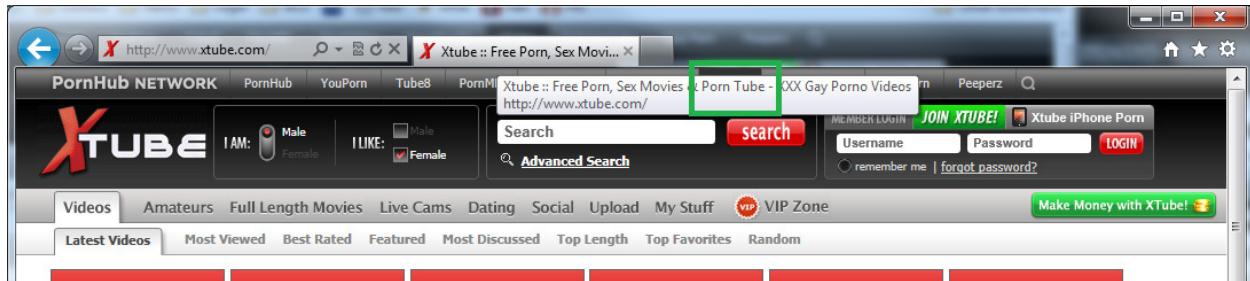


For trade contact me in ICQ 7874636, Only sites with thumbs 240x180 and skim > 70

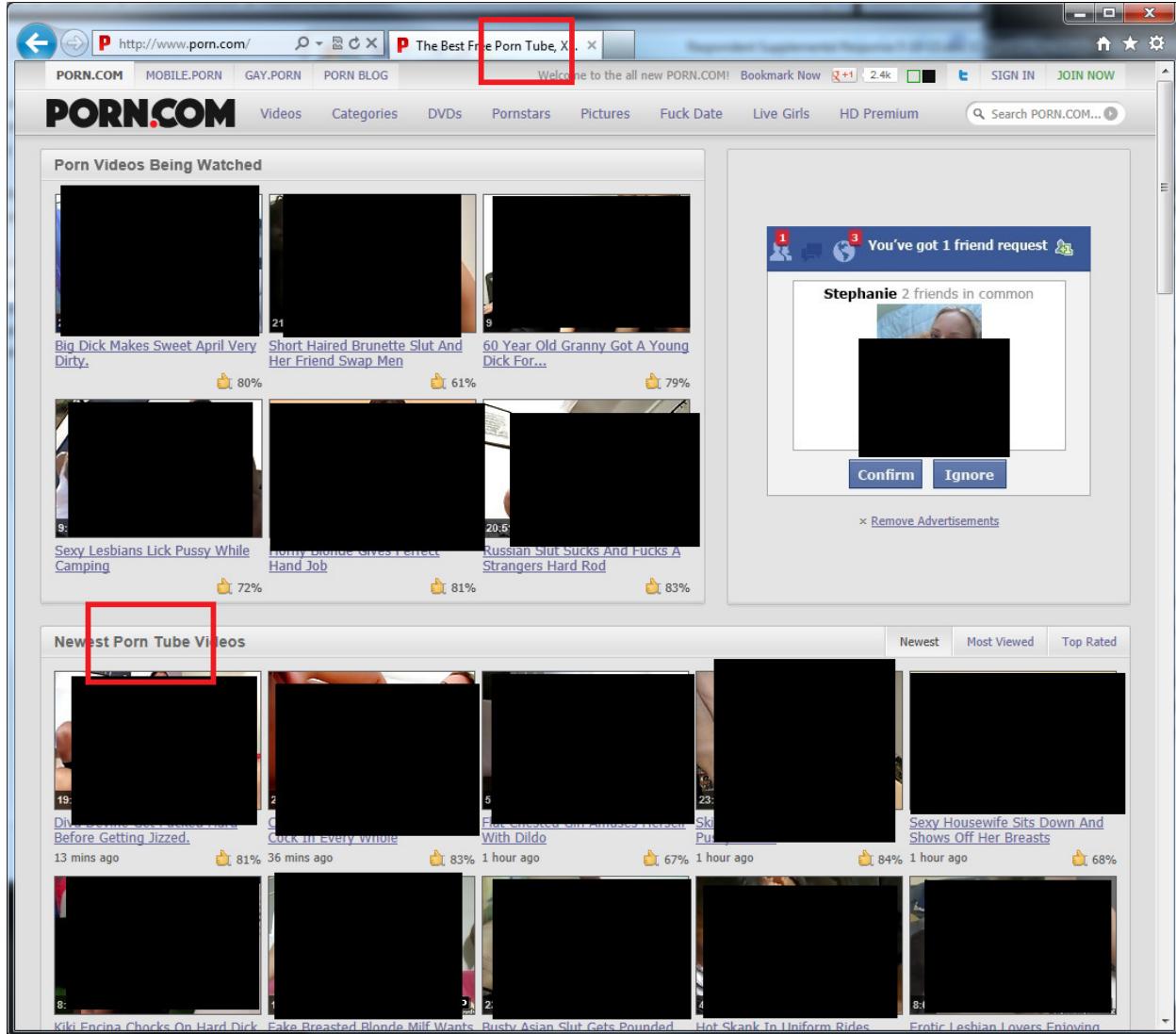
Xxxx.com



Xtube.com



Porn.com



Youjizz.com

